

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT
NORTH AMERICA, INC., et al.,

Defendants.

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CIVIL ACTION NO. 6:10-cv-00327

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION TO
EXTEND P.R. 3-1 DEADLINE AS TO ONE PARTY**

NOW COMES Plaintiff INNOVATIVE GLOBAL SYSTEMS LLC ("IGS") to file its Unopposed Motion to Extend its P.R. 3-1 Deadline as to One Party, and shows the Court as follows:

1. Plaintiff requests that its deadline to serve its P.R. 3-1 disclosure with respect to WIRELESS MATRIX USA, LLC ("Wireless Matrix") be extended through and including November 15, 2010. The purpose is to determine whether the Parties' negotiations regarding a resolution of Plaintiff's claims can be brought to fruition. Wireless Matrix does not oppose this motion.

2. Plaintiff will comply with its existing P.R. 3-2 deadline with respect to Wireless Matrix and its P.R. 3-1 and P.R. 3-2 disclosure deadline with respect to Defendants Volvo Construction Equipment North America, Inc., Volvo Trucks North America, Inc., Komatsu American Corp., Caterpillar, Inc., Topcon Tierra, StarTrak Systems, LLC, and JLG Industries Inc.

Dated: November 3, 2010

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of November, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Michael T. Cooke